

I. IDENTIFYING INFORMATION

GOVERNOR'S COORDINATION AND  
SPECIAL SERVICES PLAN

State/Commonwealth of  
MISSOURI

for the period  
Program Years 1994 and 1995

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## II. PROGRAM PLANNING INFORMATION

### A.1. through A.4 Governor's Goals and Objectives

The rapid and fundamental changes in the global economy continue to be a recurring theme in national policy. The need to adapt our economic and social policies, to increase productivity, and maintain our competitiveness in the international market place continues to be debated. The need for change is recognized.

To prosper in the global economy of the 1990's and beyond, Missouri must alter its approach to economic development. This need is especially relevant at a time when Missouri must position itself for the continued transition of its employment and training programs to conform with amendments to the Job Training Partnership Act (JTPA) at the federal level. The State has continued to validate its belief that employers will support a training system which recognizes the need for a work force that has received the added value of quality education and training. At the same time, the transformation of Missouri's employment and training programs must parallel the focus on quality mandated by the Governor's economic development strategy.

The Governor has recognized that success can only be accomplished by encouraging shared ownership, cooperation and accountability among the various partners in the job training and placement system. Among the changes he has called for in economic development policy are: enhancing the shared and local focus of economic development strategies, including the establishment of regional offices; targeted economic development assistance to encourage innovation and expansion of "high" technology firms; and the refocusing of programs to help Missouri's small businesses grow and create new jobs, including entrepreneurial support. These objectives parallel changes required of the amended JTPA. There must be a continued focus on: strengthening fiscal and program accountability; enhancing the leadership role of Private Industry Councils and the entities with which they are linked; targeting of services to those facing serious barriers to employment; and ensuring that high quality services are responsive to the needs of individual participants in the local labor market.

These goals and objectives for employment and training in Missouri have guided the development of the Governor's Coordination and Special Services Plan for PY'94-95. They provide direction for the use of scarce job training resources and their linkage with the proposed economic development strategies. They are the Governor's priorities

for the job training and placement system and describe the direction in which the system should move as it strives to correspond with changing economic development needs in a rapidly changing economy.

#### Provide Opportunity and Ensure Economic Growth

Increasing Missouri's economic potential requires a strong coordinated approach to economic development. In turn, effective economic development necessitates diverse yet interrelated efforts to assist employers. Such efforts may include assisting new companies in Missouri, supporting existing businesses with expansion efforts, or assisting employers in finding employees with the needed capacity for the job.

The first step toward strengthened coordination for Missouri, however, is underway through the Missouri Business Council. This council has been charged with oversight of the State's comprehensive economic development strategy, and its preliminary recommendations were completed in January 1994.

In addition, the State's comprehensive economic development strategy has taken into consideration the recommendations of the Work Force Preparation Task Force, the Missouri Training and Employment Council Strategic Plan and any Committee of the General Assembly established to study the work force development system. The following objectives incorporate what is currently known about the goals and recommendations of these studies.

- Expand a coordinated marketing program which clearly communicates to employers and the public the availability and capability of job training and economic development resources in Missouri.
- Increase the efficiency of delivering training for potential employees of new or expanding businesses and, when necessary under the parameters of an amended JTPA, provide retraining, upgrade training, and entrepreneurial training to support new capital investments of existing businesses through both state and federal resources.
- Using strategies developed by the State Work Force Preparation Task Force, promote and encourage employers to define the necessary work place skills required of their workers so that appropriate training programs can be developed.

- Provide continued support to ensure a comprehensive, coordinated public-labor exchange.
- Promote and support continuing improvements in Missouri's labor market information system.
- Promote the distribution of needed-skills information to entities in the employment and training delivery system for the purpose of facilitating necessary changes in the design and development of training programs.
- Promote and encourage further opportunities for "open entry, open exit" programs for occupationally specific training.

Equip Missourians With Basic Skills to Enhance Their Potential for Employment and Life-Long Learning

An educated citizenry is Missouri's greatest asset as we move toward the 21st century. Missourians must be proficient in the basic skills necessary for self-sufficiency and should be offered a system capable of transferring such skills directly to an occupation or to additional training. Job specific vocational skills continue to be necessary for successful job performance. This complements the philosophy in the Secretary's Commission on Achieving Necessary Skills (SCANS) report. Moreover, this goal readies the State in preparation for the accommodation of national programs integrating federal labor and educational initiatives emphasizing the transition from school to work.

Meeting the objectives below will help Missourians achieve their maximum individual employment and career path potential while building a foundation for life-long learning.

- Continue to support and promote the development of "no wrong door" service models wherever locally desired to accommodate ease of access to work force preparation and job training opportunities.
- Provide access to and acquisition of basic literacy skills particularly when such programs enhance job training tailored for the work place.
- Improve and promote economic diversification through the use of skill adjustment strategies for workers displaced by such change as Department of Defense reductions impacting Missouri military or defense

industry contractors, high technology deployment or plant closings.

- Provide the coordinated means for welfare families, particularly JOBS participants, to gain knowledge and job skills necessary to become financially independent.
- Ensure training opportunities and support services are developed which enable targeted populations including the homeless and veterans to effectively participate in Missouri's work force.
- Cooperate with Private Industry Councils (PICs) and other state agencies to promote, develop, and/or strengthen local and state programs to ensure training opportunities are developed which enable targeted populations -- including the homeless, veterans and women choosing nontraditional occupations or apprenticeships -- to participate in Missouri's work force.
- Continue to implement public/private initiatives to address the remedial and basic education needs of, as well as opportunities to gain work experience for, at-risk youth and dropouts.
- Aggressively solicit, encourage and utilize employer knowledge to complement available labor market information and to plan training programs.
- Promote the development of local multi-optional school-to-work transition and/or apprenticeship programs and models.
- Develop and promote incentives to encourage public and private sector employers to increase the skill level of Missouri's work force by providing continuous employee training.

Expand the Capacity of Missouri's Job Training Program to Deliver More Efficient and Effective Services

Missouri's job training and employment system is composed of economic development, training, and placement agencies in four departments of state government which administer a wide variety of federal, state, and local job training programs. In addition, a number of agencies provide supportive services to training program participants or use the training system to provide services to their clients.

Clearly, these agencies as well as other statewide organizations such as the Missouri Organization of Private

Industry Council Chairpersons, Training and Employment Administrators of Missouri, and various councils and associations involved with vocational education, community action, child care, and women's economic development must work together with private business and industry to ensure effective program implementation. By meeting the objectives outlined below, Missouri can ensure improved operation of job training programs.

- Encourage increased involvement of Private Industry Councils in the forming of cooperative partnerships for the design and development of local job training programs which meet local employment and citizen's needs.
- Develop and promote the technical capacity of professional staff members to ensure they maintain a high quality of service.
- Support joint job training projects among related state agencies and initiate additional projects which meet the Governor's goals.
- Support community partnerships between state and local governments, service agencies, and business and civic leaders which develop and implement a coordinated strategy to identify and meet the employers requirements of the future work force.
- Encourage cooperative uses of training and employment funding, facilities and staff resources for a more comprehensive and coordinated statewide system.
- Facilitate the coordination of public employment and training policy development, public awareness of the policies and maximum utilization of the public and private employment and training resources in Missouri.
- Pursue State and federal legislative initiatives which accommodate the changing needs of the employment and training system, especially those anticipated for potentially changing State administrative structures, establishing comprehensive systems and implementing State and national policies and program objectives.

#### **Nontraditional Training and Placement for Women**

Missouri JDT will continue to cooperate with PICs and other state agencies to promote, develop and strengthen local and state programs to serve the employment and training needs of women in nontraditional employment and apprenticeships.

Preliminary plans are to invite the Coordinator of the Sex Equity Program under Carl D. Perkins Vocational and Applied Technology Education Act to share information with MTEC. She has already provided information to the AE Directors on existing programs and resources.

Two of those statewide programs are Project ENTER, a public relations and support service for participants and educators in nontraditional vocational education training programs, and CHANGING CHANNELS, a satellite program designed to recruit women into the technologies and occupations nontraditional for females. At the local level, regional and district sex equity coordinators plan and implement exploratory activities in the form of workshops, hands-on activities, exploratory sessions, role modeling, and mentoring services to women interested in the nontraditional vocational education training programs. These programs will continue to be coordinated to benefit the local women in need of services from the vocational education and employment and training community.

Further coordination and technical assistance activities may be explored for specific local SDA needs. For example, one SDA has created a proactive committee of representatives from business, industry, education, employment and training, human services, local media, and labor to address the issues of successful integration of women in the workplace with special emphasis on employment opportunities in non-traditional occupations.

The committee is active in the formulation and implementation of an educational awareness program. This program, through workshops and presentations, provided not only information and guidance but establish an outreach and networking system for both women and businesses. Activities include a Speaker's Bureau; a Career Day for Women by Women; and publication and distribution of a variety of multi-media materials in the local area.

In PY'92, technical assistance grants were provided for SDAs to develop plans to increase awareness and placement of non-traditional training and employment opportunities available for women in growth occupations in Missouri. The proposal guidelines required broad-based community input into the planning of an educational and employment opportunity awareness program with emphasis on nontraditional training opportunities for women. As a result of this awareness building, 42 women received training in nontraditional occupations using formula Title II funds during PY'92.

The success of these activities was the basis for the decision to develop and apply for a national demonstration

grant to further nontraditional employment and training. This grant was approved in late PY'93 and is currently being implemented by two SDAs (Kansas City and Springfield areas).

Each local Job Training Plan for PY'94-95 contains goals and descriptions of local efforts to promote training and increase awareness of training and employment opportunities for women in nontraditional employment areas. While no numerical state minimum has been established for the participation in nontraditional training for women, it is anticipated that in PY'94 there will be an increase of 3% in the number of women who participate in Title II funded non-traditional training. At the state level, we plan to continue to increase our outreach and educational efforts to participants, employers and the employment and training system in general. Also, the state continues to support the Missouri Occupational Information Coordinating Committee, who regularly provides updates of occupational information to state and local agencies. This information includes SDA specific nontraditional occupations for women.

Coordination and utilization of existing statewide program efforts through Carl D. Perkins Vocational and Applied Technology Education Act continues to be pursued. Adaption to local needs of strategies and/or products from the Job Training 2000 project is encouraged.

Additionally, JDT continues to work with other state organizations. For example, in the past, the Missouri Council on Women's Economic Development and Training has helped JTPA focus attention on women's employment and training needs, including nontraditional occupations. Through its current relationship with employers and the employment and training system, the Council is a valuable resource in the promotion of JTPA's educational efforts. It can also assist to encourage innovation in outreach and targeted service delivery of nontraditional training and placement for women in cooperation with the local employment and training system. It is a primary partner in the successful implementation of the recently approved demonstration grant.

For PY'94, the Women's Council, through a JTPA 8% contract with DESE, continues to expand and build on the previous year's projects to provide women with basic skills training in math, communications, and reading in preparation for enrollment in full-time skill training in nontraditional occupations. Projected participant outcomes include increased levels of basic skill competencies in math, communications and reading, enrollment in a nontraditional skill training program for the 1994-1995 school year, and

successful placement into the nontraditional work force upon completion of training.

The replication of the Women's Success Center is being encouraged. This program provides the structural framework for: a strong system of support from peers and mentors; a

college preparatory semester; the development of individual portfolios; two to four semesters of career skills acquisition or enhancement; and finally, a capstone seminar which is modeled after the leadership training courses offered by Chambers of Commerce nationally.

The video entitled "Mentoring: Achieving Potential" was produced by a consortium of 11 educational institutions. The video captured the collective wisdom of mentors and student protegees. The mentors and students shared their experiences and encourage others to participate in mentoring programs. The video will be distributed to agencies whose clientele can benefit from mentoring opportunities, particularly women engaged in nontraditional training or jobs.

#### **Anti-Drug Assurance**

The State assures its adherence to the Anti-Drug Abuse Act of 1986. See Exhibit I.

#### **Private Industry Council Oversight**

Each SDA has a written substate monitoring plan in accordance with standards developed by the State. The State's standards require the SDA/SSG to operate local oversight systems to review both compliance and quality issues. The Division will test each SDA/SSG's implementation of their substate plan to determine if it is in compliance with all applicable laws. If an SDA's monitoring is sufficient, then the State will focus its oversight efforts in a qualitative review of programmatic areas. It is envisioned that this monitoring approach will better enable the State to determine weak programmatic areas, thereby enabling the State to systematically improve the quality of the services to participants. See Attachment D for details of the substate monitoring plan minimum standards.

#### **B.1 through B.6 Coordination**

The Governor recognizes there is a diversity of agencies and programs which constitute job development and training services in Missouri. Changing demographics, economic conditions, and a focus on "quality" require that Missouri blend diverse but related service delivery systems into the most effective and efficient training and employment system possible. This focus stems from an amended federal law and the Governor's economic development strategies, both of

which are steering the system toward collaborative changes for quality and accountability.

Passage of HCS/HBs 294 and 405 in the Spring of 1991 which established the Missouri Training and Employment Council (MTEC) has strengthened coordination and collaboration of this diverse system. The Council is charged with federally mandated duties of the State Job Training Coordinating Council, as well as a mandate to recommend a policy, and subsequently a plan, to address three (3) major areas. Those areas concern:

1. Public and private participation toward achieving Missouri's objective of full employment;
2. Methods to improve federal and state resources in providing job training services; and
3. Coordination of training and employment activities with other related activities.

Prior to the passage of State legislation, MTEC had begun this larger mission. Through its review of State plans and local JTPA plans, it had gained insight into the strengths and weaknesses of the statewide employment and training system. It could, therefore, better discuss and offer suggestions for coordination as well as new program initiatives.

Key among these new MTEC initiatives has been the formulation of a statewide training and employment policy in 1992 which has guided the development of a training and employment plan. This plan was completed in December 1993.

The greatest challenge of the Missouri Training and Employment Council will be to determine ways to further strengthen the system by establishing an even greater level of coordination among the many public and private job training partners. It is essential that the statewide training and employment plan accommodate objectives of the new economic development strategic plan as well as those of the amended JTPA.

In order to promote and facilitate continued collaboration among agencies within the employment and training system at both State and local levels, the Coordination Criteria for PY'94-95 are:

1. Using successful models from Missouri and other states, local Private Industry Councils (PICS) should explore the initiatives, programs and processes used to collaborate in establishing community partnerships.

These partnerships will enhance coordination and eventually, when fully developed, lead to the provision of more accessible, customer friendly employment and training services.

2. Local PICs, using the technical and financial assistance made available to them, will explore and move to implement where feasible school-to-work and/or apprenticeship models in collaboration with education agencies.
3. State agencies will promote the use of common assessment and screening factors within the employment and training system for use at the local level.
4. Both State and local training and employment agencies will promote curriculum development and the linkage of programs that more clearly tie education and training systems to the world of work.
5. State agencies will continue to investigate the potential for mutual sharing of pertinent training-related information for use at the State and local level. The initial emphasis for sharing will be to track participants across programs, to evaluate programs, to develop participant profiles and to prepare reports. If necessary, State agencies will actively pursue clarification and interpretation at the federal level..
6. Collaboration at the local level among the various agencies identified in the local coordination plans will be continued. In PY'94-95, the PICs will be encouraged to expand further the use of resources (linkages) potentially available from other State and federal programs. These programs will include those from the following federal laws: Carl Perkins; Wagner-Peyser; Job Opportunities and Basic Skills (Missouri FUTURES); Adult Education Act; Food Stamp Act, National Apprenticeship Act; Rehabilitation Act; Older Americans Act; Trade Act; Stewart B. McKinney Homeless Assistance Act; United States Housing Act; National Literacy Act; Head Start Act; Elementary and Secondary Education Act; Individuals with Disabilities Education Act; and JTPA to support local programs in an integrated approach for delivery of services to clients to include special populations such as the disabled, single parents, welfare recipients and offenders.

Partnerships between state and local agencies focused on new joint programs and new lines of communication. The most significant and lasting partnership has been the voluntary

cooperation of local agencies to provide services because of mutual interests. JTPA provides the legal authority to bring together public and private agencies and employers to influence service delivery in their regions. Thus, previous partnership efforts were supported by an entity with the resources and talents to bring together the necessary actors at the local level to ensure efficient and cost-effective delivery of services.

#### Education

In this time of reduced resources to meet the needs of economically disadvantaged adults and youth, the need to avoid duplication of services while expanding the range of services offered is even more critical. Therefore, the cooperative efforts established over time with many of the service and training agencies, particularly those programs funded under the Carl D. Perkins Act and the Adult Education Act, will help to provide training and basic skills.

At the state level, the Division encourages, provides technical assistance to, and monitors the activities of each SDA to increase cooperation and planning with all educational agencies and local advisory groups responsible for, or interested in, occupational and basic education training within their service delivery area. Also, the Division will encourage the continuation and, when necessary, expansion of educational representation on local private industry councils and advisory groups.

This mutual representation at both local and state levels serves as a means of quick communication and understanding of the operational activities with regard to the impact upon training needs.

Cooperative efforts will continue between and among JDT; the Department of Elementary and Secondary Education, which is responsible for the state administration of both the Carl D. Perkins Act and the Adult Education Act of 1965; Private Industry Councils within the JTPA SDAs; and the Missouri Training and Employment Council through:

1. Cooperative use of the Missouri vocational education delivery system, including comprehensive high schools; area vocational schools; community colleges, and state colleges and universities, as a primary mechanism to deliver instructional programs throughout the state.
2. Continued development of a cooperative approach to technical assistance which will be mutually beneficial to strengthen the statewide delivery of occupational and basic education training.

3. Cooperatively sharing operational plans at both the state and local area levels in order to better coordinate statewide delivery of occupational and basic education training.
4. Meeting at least annually at the state and at each local level to address common problems in the employment and training field and to develop strategies for economic development, basic education, occupational training, and other areas of mutual concern.
5. Cooperative use of labor market information through the Missouri Occupational Information Coordinating Committee to facilitate planning and delivery of specific occupational training throughout Missouri.

Additionally, at the state level and the local level or between those levels, multiple meetings of staff members responsible for the administration and implementation of the respective Acts are held to discuss specific strategies for improved coordination, implementation, and planning. This coordination provides the mechanism to continually improve occupational training opportunities for all citizens of Missouri.

#### Job Opportunities and Basic Skills Training

The Missouri Job Opportunities and Basic Skills Training (JOBS) program, known as FUTURES, is fully implemented. The State Departments of Social Services, Labor, Education, and Economic Development are charged by State Statute (RSMo, 1989 - 208.405) with avoiding duplication, with making the best use of existing systems and with using general revenue to maximize the level of federal dollars flowing to Missouri for the JOBS program.

Toward this end, the Directors of these departments meet regularly to discuss pending policy and procedural concerns. JDT has actively participated in these meetings. Additionally, there are several joint contractual agreements to provide additional case management services, individual classroom referrals, and other job readiness services. These contracts link several funding sources including FUTURES, JTPA, Wagner-Peyser, Adult Basic Education, Carl Perkins, and private funding. Some areas have co-located staff and services.

The employment and training system is actively involved in the provision of the occupational skill training and on-the-job training. It also provides assessment services which compliment the initial assessment made by the FUTURES case manager. Additionally, the employment and training system

provides other appropriate services to aid the AFDC participant in reaching his/her career goals.

The Missouri Training and Employment Council (MTEC) reviews the initially submitted JOBS State Plan and any amendments.

During the implementation phases of FUTURES, the Council received updates from the State director of the program. Now that FUTURES is implemented statewide, the Council has placed a report on the status of FUTURES graduates as a permanent annual agenda item for its System Capacity and Performance Committee.

Approximately two years ago, the Division of Job Development and Training (JDT) and the Division of Family Services (DFS) entered into an agreement for a view only on-line system so SDAs could access specific FUTURES and Income Maintenance data screens. This information can be used to document the eligibility status of an AFDC and/or Food Stamp recipient and the individual's status in the FUTURES program. This system is available to all 15 SDAs. It has expedited routine eligibility verification as well as enhanced the efficiency of service to the mutual client.

Also, PY'94 will be the fourth year JDT, DFS, and the Department of Elementary and Secondary Education (DESE) will enter into a joint contract to provide FUTURES clients with occupational skilled training, funded by DFS FUTURES but using the existing education and training service systems.

In several areas around the state, pilot projects involving the FUTURES program and other education, training, social services agencies, and businesses are in various stages of development and/or implementation to provide education and training services and ultimately employment to individuals served by Family Services. These include:

- an on-the-job training program with a specific employer where the welfare grant is diverted to subsidize a portion of the wage paid the participant/employee;
- a project to provide education, training, and employment to non-custodial parents of AFDC children in order for them to financially support the children; and
- regular state cabinet level meetings of the service agencies which comprise the human services, education, employment, and training systems to discuss current and future projects.

#### Child Care

With the emphasis of providing for the individual's assessed needs and the increased demand on limited JTPA funds for

training and supportive services including follow-up services to help the former participant retain employment, the state and local employment and training agencies have increased their search for additional resources. Child care has always been a primary and costly need of many of the participants served by JTPA.

In the search for resources to meet participant's needs, subsidized child care under the Child Care and Development Block Grant Act of 1990 and the expansion of the Head Start programs to meet not only child care needs but to provide health information and crisis assistance for the entire family have been welcomed resources. Many SDAs have had a longstanding working relationship with the community agencies and schools which provide these services, but the increased involvement with DFS through the FUTURES program opened up this resource for other SDAs.

At the State level, the enactment of the Child Care Development Block Grant of 1990 resulted in a change in the responsibility for administration from one state agency to another and the establishment of an advisory committee of child care providers, educators, and users. The Division is a member of that advisory board.

#### At-Risk Youth and Literacy Services

Missouri has continued to target at-risk youth in its school-to-work projects and locally funded youth programs. For approximately five years, Missouri has addressed the needs of youth at risk of dropping out of school. Initially, these services and other literacy services for youth were provided as a pilot project through JTPA 8% funds. At its peak in PY'91, the Centers for At-Risk Youth (CARY) numbered 21 which covered most of the state. These projects provided services to school dropouts and potential dropouts with remedial and basic education deficiencies who were also economically or academically disadvantaged. Generally, the program was provided to an eighth grade student. A dropout could enter at any time and either select to obtain a GED certificate or reenter high school. Often, a six-week summer remedial education program was available for those eighth graders who needed the services.

Beginning with the ninth grade, students could be placed in basic skills classes which included: language arts/communication skills, social studies, science, mathematics, and fine arts.

For a high school student who could not earn enough high school credits to graduate with his regular graduating

class, the project emphasis shifted toward attainment of a GED certificate. An eleventh grade student was referred to the appropriate occupational education program. Over time, these programs proved so successful in reducing dropouts, many of their components have been assimilated into the general curriculum of the public school system. They are also the model for the school-to-work projects currently being funded in Missouri.

Currently, funding comes from Carl D. Perkins funds, state vocational education, Adult Basic Education (ABE), Average Daily Attendance (ADA), JTPA 8% funds, local funds, in-kind contributions, and local JTPA Title II-A, Title II-C, and Title II-B.

In the fall of 1993, the U.S. Departments of Labor and Education, in conjunction with the introduction of the proposed School-to-Work Opportunities Act of 1993 legislation, made planning grants available to states to begin the process of designing a state school-to-work system.

Missouri applied for and received a planning grant of \$290,000 in January 1994. A Governor's Task Force is to be appointed to develop a statewide school-to-work system for the youth of Missouri. Five state agencies, which include the Coordinating Board for Higher Education (CBHE); the Department of Economic Development (DED); the Department of Elementary and Secondary Education (DESE); the Division of Family Services (DFS); and the Department of Labor and Industrial Relations (DLIR), are currently collaborating in this important initiative. The goal of this initiative is to establish a comprehensive and effective school-to-work system. This system will offer young Missourians the opportunity to participate in high-quality, performance-based programs resulting in a high school diploma, a degree or diploma certifying successful completion of at least one year of postsecondary education, and an industry-recognized skill certificate. A statewide awareness campaign will be launched in late Spring 1994.

#### State Allocation Procedures

The State substate allocation systems are described in Attachment B or within the appropriate funding program description.

### III. PROGRAM ACTIVITIES

#### Evaluation

During PY'92 of JTPA, 11,978 Missourians entered training programs using Title II-A formula funding throughout the State. Of the 9,310 participants who completed the program during the year, 5,336 were placed in jobs. This represents a 57% entered employment rate.

For the 13 week follow-up, of the 2,727 persons terminated to employment who were sampled for Title II-A, 81% were still employed at the 13th week.

Missouri's SDAs performed well on the Title II-A performance measures during PY'92. Of particular note during the program year were two performance standards: Follow-Up Welfare Weekly Earnings, which exceeded the standard by \$14; and the employability enhancement rate for youth, which exceeded the standard by 24%.

Each SDA was assessed against performance standards for both adult and youth programs in Title II-A as required by the law. Statewide, the SDAs' actual adult follow-up employment rate was 64%; the actual follow-up welfare entered employment rate was 51%; the actual follow-up weekly earnings was \$221; and the actual follow-up welfare weekly earnings was \$221. The SDAs' actual youth entered employment rate was 52% and the actual youth employability enhancement rate was 57%. All 15 SDAs were eligible for incentive grants by exceeding a weighted average of their performance standards.

During PY'92, the state's customized training program, a program designed to meet the training needs of new and expanding businesses by tailoring training programs to employer needs and to retrain employed workers when made necessary by new capital investments, utilized several primary funding sources. These sources were JTPA Title II-A 8% and formula funds and the Missouri Job Development Fund. These combined resources provided approximately \$4,881,552 for Customized Training activities.

The State trained 67 eligible participants using JTPA Title II-A (8%) funds. Those who entered employment received an average hourly wage of \$5.06.

Through the Missouri Job Development Fund, the state funded approximately 100 projects which helped train 3,800 state residents for newly created jobs, and retrained 1,419 so they could retain their current employment.

Joint efforts between the JDT and DESE resulted in an additional 34 projects to train 10,462 participants.

During PY'92, the Experienced Worker Program served 885 persons age 55 and over. Of those participants that completed program services, 62% entered unsubsidized employment at an average hourly wage of \$5.44.

In the first half of PY'93 (through December 31, 1993), 3,642 participants were served in Title II-A and 2,437 were served in Title II-C training programs statewide. Of those who participated, 52% of the Title II-A and 39% of the Title II-C entered employment.

SDA performance for the first half of PY'93 was evaluated using the Secretary of Labor's performance standards model. Statewide, the SDAs' adult measures were the actual follow-up employment rate of 64% and the actual follow-up weekly earnings of \$223. The actual follow-up welfare weekly earnings was \$208 and the actual follow-up welfare entered employment rate equalled 52%. Statewide, the SDAs' actual youth entered employment rate was 48%; and the actual youth employability enhancement rate was 53%.

During the first half of PY'93, customized training projects, using Title II-A and Title II-C formula funds, trained 16 individuals. Ninety-two percent (92%) of these individuals entered employment. During this same period, the Division provided funding through the Missouri Job Development Fund to serve 540 individuals at an entered employment rate of 82%.

The Experienced Worker Program provided job training to 271 economically disadvantaged individuals aged 55 and over during the first half of PY'93. Seventy-four percent (74%) of the participants who completed the program entered employment.

With approximately 848,000 economically disadvantaged persons eligible for JTPA programs, Missouri's potential demand for job training far exceeds the supply of job training services. These limited job training resources must be used in the most efficient and cost-effective manner to increase employment, training, and placement opportunities for Missourians. By coordinating the planning, design, and delivery of job training with other related public and private activities, the programs and services benefited more Missourians than would have otherwise been possible.

The following description of the monitoring process summarizes how SDAs' performance is monitored and the

corrective action process for programs. Under-expenditure is monitored and the deobligation/reobligation policy is explained in Attachment A.

#### Projected Use of Funds

The State of Missouri will conduct on-site compliance or quality control monitoring visits of all SDA Title II and Title III programs to determine if they are in compliance with JTPA, state established fiscal policies and procedures, related applicable laws and regulations, and the local Job Training Plans.

The state has not established specific elements or standards beyond those of JTPA which include goals for:

- the training of women in nontraditional employment;
- the training-related placement of women in non-traditional employment and apprenticeships; and
- a description of efforts to be undertaken to accomplish the goals described above, including efforts to increase awareness of such training and placement opportunities.

However, substate monitoring would include a determination of compliance with any of the stated goals as a part of the monitoring process.

Similarly, operators of Title II-A 8%, experienced worker, and other programs will also be monitored annually to ensure compliance or quality control issues. The Division will also test selected problem areas for further, more in-depth review when appropriate. These reviews may consist of surveys, in-depth reviews of reporting, or more detailed on-site program reviews. Program quality reviews may be substituted, on an alternating year basis, for compliance reviews.

Written reports will be issued after each monitoring with appropriate corrective action required within a specified 30-day period. On-site follow-up regarding the implementation of SDA corrective action will occur at a reasonable time interval following the receipt of a corrective action plan, when required.

The State will also provide support to SDAs through various ongoing training and technical assistance activities. SDAs and individual program operators will also receive direct JDT on-site training and technical assistance, as needed, based on findings from both on-site monitoring and desk reviews. These activities may be provided on an individual basis or through group sessions on a regional or statewide scale. Additionally, training and technical assistance will

be targeted to enhance participation and skill building of PICs as well as MTEC, particularly in the role of oversight and monitoring of programs.

In addition to the State's annual on-site monitoring of SDAs and state-funded programs, the Missouri Training and Employment Council also maintains an active role in the oversight of all JTPA-funded programs. The Council is divided into committees, each dealing with various programs. Performance data is provided to the Council at each meeting. Problems are discussed and acted upon in order to achieve appropriate corrective action. All JTPA-funded program titles and subparts are included in the Council function.

The Council also provides review and input into the State's incentive policy on at least an annual basis and becomes actively involved in the methodologies used to provide technical assistance and capacity building to program operators and SDAs in Missouri. This function is performed primarily by the System Capacity and Performance Committee, although other committees become involved if a technical assistance problem/issue develops in their assigned area of responsibility.

#### Administrative Activities

This funding source will be used by the State for administrative activities and selected allowable activities under sections 121 and 122 of JTPA. Administrative activities include planning and evaluation, program management, operations and monitoring, and fiscal management.

The Division assists SDAs with the development of local plans and evaluates program effectiveness for both state and local programs. JDT also coordinates and upgrades statewide participant and financial management of program performance levels. A statewide post program follow-up survey based on a random sample of all Title II-A adults and adult welfare terminees is conducted weekly 13 weeks after the participant's termination date.

Local SDA job training plans are evaluated by the state for compliance with state and federal law and certified for consistency with the Governor's Coordination and Special Services Plan. The State fulfills all federal reporting requirements on JTPA program performance and develops policy issuances and regulations for the implementation and operation of JTPA.

The Division continues to review and refine its programmatic financial and administrative policies to provide greater integrity to the entire JTPA system without circumventing the local PICs' authority.

The Division and/or the SDA monitors contractors and job sites for compliance with federal laws and regulations including compliance with procurement policies. The State also monitors planned versus actual performance to ensure that SDA contractors' performance demonstrates consistent progress.

The Division ensures that the obligation and expenditure of JTPA funds and the use of property are in compliance with the requirements and conditions of JTPA grants. The State

provides financial information to meet federal, state, and internal financial reporting requirements.

Accounting records and documentation to identify and support expenditure of JTPA funds are also maintained. In addition, JDT will review independent audit reports of each recipient of JTPA funds for compliance with federal and state regulations. Procedures for deobligation of unspent funds and repayment of misspent funds are included in the fiscal management system.

The Division's current Deobligation/Reobligation Guidelines will be implemented on July 1, 1994. A copy of the Guidelines are included as Attachment A. The Guidelines cover Title II-A and Title II-C funds which are awarded to SDAs. All other Title II-A and Title II-C funds are contracted and monitored on an annual basis by the state agency.

The Division will conduct selected activities under Section 121(c) of the Act as described in this plan. JDT provides staff support to the MTEC to assist the Council in carrying out its duties as described in the Act.

#### Training Activities Titles II-A, II-C, II-B

Resources available for PY'94 are approximately \$3,939,313 less than PY'93 for Title II-A, Title II-C, and Title II-B. SDAs in Missouri will use JTPA Title II-A, Title II-C, and Title II-B resources to provide a variety of job training activities in accordance with approved Job Training Plans. The Title II-A and Title II-C funds will primarily be used for occupational skills classroom training, work experience, and entry employment training activities. However, the planned funding for educational activities, both basic skills and remedial, has been growing and is expected to grow more in PY'94.

Participants' assessments are documenting a need for a continuum of training and education activities and supportive services, particularly child care and needs-based payments, in order to assist the participant in becoming self-sufficient. This longer term commitment toward self-sufficiency by the participant has lead to more intense JTPA case management.

Many of the 15 SDAs in Missouri identified additional SDA specific hard-to-serve barriers for Title II-A and Title II-C. These apply as appropriate to an adult, in-school youth, and/or out-of-school youth. The Governor approved barriers include food stamp recipients, single parents with

dependent children, family members in an AFDC or other public assistance household, displaced homemakers, and individuals who experience transportation problems which constitute a substantial barrier to employment.

The program offered to economically disadvantaged youth during the summer, using Title II-B funds, consists predominately of opportunities to gain work experience. However, there will continue to be a strong emphasis on youth participation in remedial and basic education and basic life skills training. Periodic reviews by JDT staff and MTEC of both adult and youth program performance provide information for policy recommendations to strengthen the system and program design.

#### **Experienced Worker Program**

Missouri will continue to serve the economically disadvantaged Missourians aged 55 and over through its Experienced Worker Program in PY'94. The Division administers the Title II-A Experienced Worker Program (EWP) through contracts with local program operators who have demonstrated the capacity to manage quality employment and training programs. The Division provides overall program planning, administration, technical assistance, monitoring and evaluation.

In PY'94 Missouri will distribute \$778,198 (excluding carry-in funds) under the Title II-A set-aside to operate job training programs for experienced workers throughout Missouri. These funds will be used to train and employ economically disadvantaged individuals, 55 years of age and over, who have encountered barriers to employment. An individual eligible and receiving services under Title V of the Older Americans Act will be deemed eligible under EWP, if there is a joint program agreement between Title V and JTPA program operators. Also, up to 10% of the individuals who meet Title V eligibility and have a barrier could be served as non-economically disadvantaged participants in the program.

The Division will contract local EWP administration and delivery through the PIC or a PIC acceptable alternative EWP contractor. This approach should increase coordination with locally administered JTPA services, linking EWP to the SDA program delivery system.

Funds will be equitably distributed to the contractor in all 15 SDAs based on an allocation method. See Attachment B for details. Each EWP contractor's responsibility will consist of, but not be limited to, the day to day operation and

fiscal functions of the program as specified in JDT's contract agreement.

On-the-job training and job search assistance comprise the primary program activities for the EWP. On-the-job training may consist of either part-time or full-time training depending upon the needs of the experienced worker and the employer. Job search assistance is a group approach to teaching effective job finding skills to the unemployed.

In addition, all program operators will offer participants a comprehensive mix of services, tailored to individual needs. Additional assistance available to program participants include: assessment of skills, personal development needs, and employment goals, vocational training, counseling and supportive services, and needs based payments if appropriate. Following the assessment, job development efforts will be directed at both full-time and part-time on-the-job training in the private sector. Since part-time employment plays an important role in matching employers' needs with the needs of experienced workers, job development efforts will be specifically targeted to those employers using part-time positions. In addition, those industries and occupations projected to have the largest employment increases in the future are frequent users of part-time workers.

Vocational training will also be made available to experienced workers through a contract with the DESE. The Division has set aside Title II-A EWP funds specifically for this purpose.

To assist EWP program operators in providing a mix of program services, JDT will place greater emphasis on the provision of technical assistance, training and program reviews. All EWP contractors will be required to meet performance standards criteria which is described under the performance standards methodology (pages 28-29). Additionally, JDT, with approval of MTEC, has established performance measures to ensure effective services to older individuals. EWP operators' performance will be regularly evaluated by JDT using a quarterly Performance Report.

The JTPA regulations' Section 628.320(a)(1), Services to Older Individuals, stipulates that the Governor shall consult with the appropriate Private Industry Councils (PICs) and Chief Elected Officials (CEOs) prior to entering into agreements to provide services authorized under the law and to assure that the services provided are consistent with the program and activities in the SDAs.

Currently, the State contracts the experienced worker services authorized through JTPA using a single scope of work for all SDAs. Since the program is operated locally by SDAs, consultation with the SDAs is inherent in the contracting process. In addition, this contracting method will ensure that services provided to participants are consistent with the programs and activities provided in the individual SDAs.

In the event that services for experienced workers are provided under an agreement between the State and an agency other than the SDA, the State will notify the PIC and CEO of the proposed arrangements while offering an opportunity for consultation prior to the execution of such an agreement.

SDAs have always been encouraged to assist experience workers with additional barriers to employment. In PY'94, the Governor has identified and accepted the following as barriers to employment for the Experienced Worker Program.

- basic skills deficient;
- high school dropouts;
- recipients of cash welfare payments, including JOBS;
- offenders;
- individuals with disabilities;
- individuals who are homeless;
- recipients of food stamps;
- displaced homemakers;
- single parents with dependent child(ren);
- family members in AFDC or other public assistance household;
- dislocated worker;
- veterans;
- individuals who have a documented chronic medical condition and are under the care of a physician;
- minority;
- individuals with outdated skills;
- individuals who do not have access to dependable transportation.

The Division will continue to encourage both state and local coordination activities. The Division has developed linkages with the Missouri Division of Aging, Missouri Division of Employment Security (DES), Older Americans Act Title V operators, and other employment and training agencies which offer services to older individuals. The Division of Job Development and Training (JDT) expects to expand employment opportunities for its older participants by networking with those agencies that provide employment services and share similar concerns for older individuals. In addition, a JDT staff member serves on the Division of Aging, Governor's Advisory Council - Senior Employment

Coordination Committee, to increase program coordination, exchange program information and staff training resources.

**State Education and Coordination Grant (8%) Funds**

In PY'94, in accordance with Section 123(a), the Governor annually allocates to the state education agency - the Department of Elementary and Secondary Education (DESE) - the funds made available to carry out this section under Sections 202(c)(1)(C) and 262(c)(1)(C) to pay the federal share of carrying out the section requirements.

The state education agency (DESE), in accordance with Section 123(c), has submitted a description of project goals to be achieved and services to be provided for school-to-work transition programs, literacy and lifelong learning programs, and nontraditional employment for women programs. The program description is jointly developed by DESE and the Governor.

The agreement shall be the Title II-A 8% agreement issued, or any amendments thereto, for that particular fiscal year. The agreement requires DESE to provide match equal to all Title II-A and Title II-C 8% funds provided under JTPA Section 123(a).

If the Governor and DESE cannot come to agreement on a plan, or DESE and the Administrative Entities (AEs) and other agencies cannot come to agreements, Subsection 628.315(a)(4)(i) and (ii), Governor's Responsibilities, JTPA Interim Final Rules, govern resolution of the non-agreement.

Attachment C is the plan jointly developed by DESE and the Governor. This attachment describes the projects to be funded and provides all specific information required in Section 123(c).

The Department of Elementary and Secondary Education, operating as the state education agency under this funding, will enter into agreements with each SDA and other entities such as other state agencies and community-based organizations, as appropriate. Agreements where 80% funds are used within the SDA will be specific to the projects funded.

Not less than 80% of the funds allocated under Section 123(a) shall be expended to pay for the federal share of projects conducted in accordance with subparagraphs (A), (B), and (C) of subsection (a)(2) and shall meet the state match requirements.

The Department of Elementary and Secondary Education uses 20% of the funds allocated under Section 123 for the purpose of coordinating school-to-work, literacy and lifelong learning, and nontraditional employment for women programs funded with 80% funds. Specifically, DESE coordinates with JDT and the Missouri Women's Council among other agencies to enhance training and educational services. In addition, DESE will provide other valuable services which enhance coordination between education and JTPA Titles II and III.

In accordance with Section 123(d)(2)(C), not less than 75% of the funds allocated for school-to-work, literacy and lifelong learning, and nontraditional employment for women will be expended for activities for economically disadvantaged individuals who experience barriers to employment. Programs funded under Section 123 will use the barriers identified in Sections 203(b) and 263(b) and (d).

Additional barriers identified by SDAs under Sections 203(d) and 263(h) will be incorporated into agreements required by Section 123(b) where JTPA 8% funds are used. Priority will be given to non-economically disadvantaged persons with barriers to employment and/or Title III participants in the expenditure of any balance of the funds described above not to exceed 25%.

The state performance goals will be incorporated into the individual project descriptions and will be evaluated periodically. In the Construction Readiness Education for Women (CREW) project, a developmental project designed to train women for employment in nontraditional occupations, service has been planned for approximately 15 JTPA eligible women.

#### Capacity Building

The Division plans to use the JTPA funds earmarked for capacity building and technical assistance at the State level to continue supporting the Missouri Training Institute. The Missouri Training Institute will continue to meet a variety of training and development needs for the Missouri Job Training System. Professional staff development and other capacity building is provided by working closely with staff and management of JDT, AEs, PICs, and local program operators.

The State will also continue to provide technical assistance directly or by procuring training consultants to work with one or more SDAs as the need dictates. The Missouri Training Institute works closely in coordination with JDT to provide preventative technical assistance as well as professional staff development and other capacity building.

The staff training is jointly designed and financially supported by the State and SDAs to provide more timely technical assistance to the SDAs on regulatory areas as well as one-on-one information sharing of best practices.

This method of training has been expanded to include other agencies. Cross-training, particularly with the Division of Employment Security and the Division of Family Services, is provided by the Missouri Training Institute, JDT, and others. This has enhanced the understanding and cooperation among the State and local service providers and will be expanded to the extent funding allows.

Each SDA will include a description of any local technical assistance and/or capacity building activities it plans to fund in its local Job Training Plan. These activities must complement any statewide capacity building or technical assistance strategies.

In an effort to increase broader SDA staff participation in capacity building, the SDA may earmark a portion of its incentive grant and/or expend formula funds as staff training.

The State has an issuance system to communicate JTPA policy decisions and pertinent information to SDAs which assists in the development and implementation of programs and plans. For instance, topics have included sharing pertinent State and federally issued information on the JOBS program, on-the-job policy clarification, and an update of the regional treatment centers where drug information and services can be obtained.

The State has issued planning guidelines to SDAs to assist in the development of their local Job Training Plans.

SDAs are also provided with information, at statewide and SDA specific levels, regarding social and economic characteristics, occupational and industrial characteristics, and labor market conditions. The State will continue to develop information on industries losing or gaining employment and industries expanding their work forces. Occupational projections to 2000 have been developed for the State, St. Louis Standard Metropolitan Statistical Area (SMSA), and Kansas City SMSA. Projections for the remaining SDAs were published in PY'91. There is a plan underway to update all of the information for publication by PY'95.

These projections identify occupations in demand as well as other occupational information. The Division, working with the State Data Center, the Missouri Occupational Information Coordinating Committee, and the Division of Employment Security, provides SDAs with a variety of publications, newsletters, and data reports on a variety of labor market issues. Special requests for sub-SDA data analysis can also be provided.

The State, through JDT, has established a field representative system to provide technical assistance in planning and implementing JTPA programs. Three (3) full-time staff members serve as liaisons between their assigned SDAs and JDT. They provide guidance to PICs and AEs to assist them in carrying out their roles and responsibilities. Other JDT staff provide training or technical assistance to the SDAs and other agencies when appropriate.

The State provides individual orientation sessions to PICs upon request and provides a training session at the annual Job Training Conference. The JDT Field Services section, in conjunction with MTI, also provides two JTPA orientation sessions per year which are open to PIC members. The Division requires all SDAs to develop and implement a PIC orientation manual for members.

The State will continue to provide in-service training through its field representatives, operations staff, and the Missouri Training Institute. In addition, the State convenes regular meetings of the SDAs' AE Directors and their staff to provide in-service training and discuss issues of concern among SDAs.

The State annually convenes a Job Training Conference for PIC members, SDA staff, and local elected officials.

#### Incentive

The incentive methodology is provided in Attachment E.

#### Title V

Missouri does not participate in the Title V JEDI (Jobs for Employable Dependent Individuals) program.

#### IV. PERFORMANCE STANDARDS

##### Methodology Adjustment

Missouri plans to use the Department of Labor's (DOL's) national adjustment models to adjust SDA performance standards. Planned performance standards are calculated from data submitted in the SDA Job Training Plan as well as the state data provided by DOL and local economic data.

Missouri plans to use the following standards for PY'94 and PY'95:

- Youth Entered Employment Rate
- Youth Employability Enhancement Rate
- Adult Follow-Up Employment Rate
- Adult Follow-Up Weekly Earnings
- Adult Welfare Follow-Up Weekly Earnings
- Adult Welfare Follow-Up Entered Employment Rate

Regional adjustments may be made on Title II-A and Title II-C standards at the Governor's option. Advanced copies of the JTPA Title II-A and Title II-C performance standards calculation worksheets and instructions were provided to the SDAs. Updated regional adjustment factors have not yet been forwarded from DOL.

At the end of the year, final performance standards are calculated for each SDA. End-of-year terminenee characteristics and updated economic data are used in the DOL model. The average unemployment for the period of April, 1993 through March, 1994 will be used for PY'94 and April, 1994 through March, 1995 for PY'95. Actual performance levels are compared to these final performance standards to determine which SDAs will be eligible for incentive grants or in need of technical assistance. An SDA may appeal any model adjusted standard that is an extreme value. Appeals will also be considered on standards that have been derived using two or more extreme factor values.

The state has a technical assistance policy in place for SDAs who do not meet their minimum Title II-A and Title II-C performance standards in the first year. As necessary, the SDA:

will be provided technical assistance from JDT Field Services, Research, and Management Information staff - which includes the follow-up system - in the form of written, telephone, and/or in-person consultation regarding all aspects of the performance standards. Such consultations/visits can include PIC members, SDA staff (including subcontractors), and administrators;

- will be provided additional technical assistance by Field Services staff to include the PIC and local administrators, and staff will report back to JDT on the SDA progress and/or issues concerning performance standards;
- may be required to submit a written corrected action plan within a reasonable time frame (usually 30 days);
- will be continuously monitored, including monthly updated performance standards reports and ongoing technical assistance throughout the program year. The SDA will be alerted to potential problems and advised as to remedial actions.

Failure to attain a minimum of four (4) DOL performance standards or failing to meet at least one youth performance standard at the end of any two consecutive program years will result in the imposition of JDT's performance standards sanction policy and exercise of the authority for remedy pursuant to Section 106 of the Act.

Such remedies may include restructure of the PIC, prohibiting the use of designated service providers or other changes as the governor deems necessary to improve performance. The governor may also select an alternate entity to administer the program for the SDA. The alternate AE may be a newly formed PIC or any agency jointly selected by the governor and the Chief Elected Official (CEO) of the largest unit of general local government in the SDA.

Any reorganization plans made in accordance with the performance standards sanction policy shall be made with full opportunity for a hearing before a hearing officer. The hearing must be requested within 10 days of the receipt of the governor's reorganization plan. A hearing will be held within 30 days of filing and written notification of the hearing determination issued within 60 days.

Upon receipt of the governor's written notification that the hearing determination upholds the governor's imposition of a reorganization plan, an SDA may appeal to the Secretary of Labor. Appeals must be submitted jointly by the PIC and CEO(s) of the SDA. The secretary will accept appeals dated no later than 30 days after the SDA's receipt of the governor's written notification of the hearing determination. A copy of the appeal must be simultaneously mailed to JDT when filed. The secretary shall make a decision within 60 days of the date of appeal.

Sanctions will be imposed through a sanction letter signed by the director of JDT. Sanction letters will be mailed to the chairperson of the PIC, the CEO(s) and the director of the AE. Corrective action plans which are developed in

response to a sanction must contain the signature of all three of these individuals.

Sanctions will be removed only through a letter signed by the Director of JDT.

In addition to the six core national standards under Title II, there are also two standards mandated by DOL for the older worker program. The following performance standards apply to Missouri's Experienced Worker Program (EWP) and will not be factored into the performance standards sanction policy:

- Entered Employment Rate; and
- Average Hourly Wage at Placement.

NOTE: Programs operated under Section 204(d) are state programs even though they may be operated by various local entities. Therefore, performance standards will be applied to the total statewide EWP.

No additional data on EWP performance is currently available to assist in setting national standards. However, the Job Training Quarterly Survey (JTQS) has detailed employment and wage data on older workers served by regular Title II-A programs. Based on this data and adjusting for the 20 hours per week employment requirement, the Secretary has set national standards. It will be necessary for the state to make adjustments for local conditions.

## V. PROCUREMENT

The Division assures its procurement system was amended to comply with the Amendments and the Interim Final Regulations for implementation by July 1, 1993, specifically Section 164. It included:

- standards to ensure fiscal accountability and prevent waste, fraud, and abuse;
- a written code of standards of conduct governing the performance of persons engaged in the award and administration of JTPA contracts and subgrants;
- written procedures for procurement transactions which include all nine items listed under JTPA Section 164(a)(3);
- procedures for handling and resolving disputes relating to procurement at both the subrecipient and state level; and
- standards for JTPA entities to follow in making determinations of demonstrated performance prior to award.

These procedures were disseminated to SDAs and other subrecipients through the Division's issuance procedure and technical assistance system.

The Division continues to review and refine its programmatic financial and administrative policies to provide greater integrity to the entire JTPA system without circumventing the local PICs' authority.

The Division and/or the SDA monitors contractors and job sites for compliance with federal laws and regulations including compliance with procurement policies and requires corrective action when necessary. The Division certifies that compliance to the Secretary. The Division has implemented procedures which require corrective action for noncompliance with JTPA Section 164(a)(3) and will impose sanctions for failure to take corrective action as stated in Section 164(a)(5)(A) and (B).

The State has adequate methods of administration to assure compliance with Section 167 of the Act through ongoing monitoring, site visits, and technical assistance.

### Special Services Activities

#### Missouri Youth Service and Conservation Corps

The Missouri Youth Service and Conservation Corps (MYSCC) combines community service and conservation promotion with

work experience, training, and educational activities for participating Missouri youth. A preference for enrollment into MYSCC is given to high school dropouts and those which are determined to be at risk of dropping out of school. Through MYSCC participation in a wide variety of eligible project objectives (work to be accomplished) these young

people gain skills which can be transferrable to unsubsidized employment, and (as an option for project design by local sponsoring organizations) opportunities for continuing education beyond the secondary level.

The State is developing enhanced post-service benefits for young Missourians who successfully complete MYSICC activity. In a cooperative effort with the Missouri Division of Employment Security, MYSICC participants will qualify for an interview with a "Show-Me" employer which has a standing relationship with DES developed through Wagner-Peyser activity.

Added emphasis is being placed on MYSICC support of continuing education of participants during and after the corps experience. Eligible applicants for projects funded with JTPA Title II-A (8%) which began during June of 1993 were encouraged to include post-service tuition vouchers to be awarded to those corps members who obtained General Education Development (GED) certification while enrolled in MYSICC activity.

The State has decided to continue this focus on education as a required feature of MYSICC projects funded by a grant from the federal Corporation for National and Community Service for assistance in recovery efforts from the flooding of 1993. Each approved award will budget a minimum of 10 percent toward educational vouchers to be used a post-service benefit for successful completers.

Title II-A (8%) funding will be used to fund MYSICC activity as a complement to the funding from the Corporation, other monies which will be sought under the National and Community Service Trust Act of 1993 from both federal agencies and the Missouri Community Service Commission. The 8% funds may also be used in combination with potential funding from the U.S. Department of Housing and Urban Development for Youthbuild activity.

Each Title II-A (8%) funded MYSICC project and component will feature educational opportunities particularly for economically and educationally disadvantaged young people with post-service benefits in employment and continuing education opportunities who successfully complete corps activities.

Funding for MYSICC activity ranges from federal, both JTPA and other, contributions from State agencies such as the Department of Conservation and the Department of Natural Resources, local sources, and private contributions.

### Missouri Veterans Program

The focus of the Missouri Veterans Program will be to provide services to veterans with serious barriers to re-employment. The federal Title IV-C funds are matched by the Private Industry Councils in Service Delivery Areas 3 and 12, 6, and 13. The amount of the PY'93 Title IV-C grant is \$148,000, with matching funds of \$160,000.

Eligible veterans include those who are: 1) disabled; 2) Vietnam era; 3) recently separated; and 4) minorities, including the homeless. Program plan figures for PY'93 include 91 (new) enrollees, and Entered Employment Rate of 86 percent, and an Average Wage at Placement of \$5.59 per hour.

The Division will conduct planning, management, oversight, reporting, and administration for the Veterans Title IV-C program to operate in the St. Louis and Kansas City metropolitan areas. An intensive case management approach will focus on a comprehensive provision of services consisting of career interest assessment, counseling, and supportive services which enable the hard-to-serve veteran to transition into On-the-Job Training and classroom-occupational training, and then unsubsidized employment.

Program plans for PY'94 will be dependent on action taken at the federal level regarding future Title IV-C grant awards. If grant awards to applying States proceeds through the same procedure currently in use, Missouri's delivery of service to veterans for PY'94 will continue with the existing model. The amount of the grant award would be the primary determining factor of performance goals, with the PY'93 standards being prorated to meet the Title IV-C allocation.

If Title IV-C funds are awarded competitively on a regional basis, the delivery of program service will be affected. Under this scenario, a single Title IV-C award would be made within Department of Labor (DOL) Region VII to one of the affected states, Missouri, Iowa, Kansas, or Nebraska. Initial estimates indicate the award could be increased to levels ranging from \$300,000 to \$450,000.

The State of Missouri is currently reviewing a number program options for expanded delivery to veterans which could be submitted for competitive consideration for a larger Title IV-C funding award. Any possible revision in program delivery by the State will be contingent on two actions by the DOL Veterans' Employment and Training Service (VETS):

- A finalized decision whether the Title IV-C grants will be made on a competitive basis within DOL Regions; and
- The requirements of the resulting "Solicitation for Grant Application" released DOL/VETS.

#### Mandatory Employment and Training Programs

The State continues to provide JTPA services to those Missourians considered to be "most in need". While the State targets service to recipients of Aid to Families with Dependent Children (AFDC) with JTPA funding, additional avenues are accessed to assist in providing service to other hard-to-serve demographic categories.

Through contractual agreements with the Missouri Division of Family Services (DFS), U.S. Department of Agriculture (USDA) funds are made available to enhance accessibility to employment and training services for Mandatory Employment and Training Program (METP) eligible Food Stamp recipients. Services available to METP clientele range from enrollment in program activities through participating local JTPA Administrative Entities which may include On-the-Job Training, classroom-occupational training, work experience, and Job Search Assistance.

During PY'93, DFS is making available \$250,000 to provide the expanded employment and training services available to METP clientele. The performance expectation is for a statewide enrollment above 1,000 persons identified as METP eligible. Participating SDAs are: 1, 2, 3, 4, 5, 9, 10, 12, and 14.

Also available in targeted areas of the State is a JOBS type intensive case management pilot program for METP eligible Food Stamp recipients, funded as a demonstration grant by USDA. The METP pilot features service to clientele by maintaining an average case load for each program professional staff member (case manager) which will continually average 35 persons. This low per client ratio permits the case manager to focus attention to overcoming whatever barriers to unsubsidized employment which may exist for each participant which is active at any given time.

Funding provided by DFS for the pilot program is \$464,992 for PY'93 with an anticipated 5 SDAs (SDAs 2, 5, 11, 14, and 15) participating by the end of the first 12 months of operation. Over the 4 years of the demonstration grant, the METP pilot program will expand to statewide coverage.

## Work Force Preparation Task Force Update

In 1991, the Missouri General Assembly created the Missouri Training and Employment Council. The enabling legislation mandated the development of a policy and then a plan to implement that policy which prepares Missouri's work force to compete in the evolving global economy.

The Missouri Training and Employment Council appointed the Work Force Preparation Task Force to complete the two specific mandates. The Policy was completed in 1992. In 1993, the Work Force Preparation Task Force completed its work on the plan. It was presented to the Council and was adopted by them in December 1993. The Plan has been endorsed by each major state agency in the work force preparation system.

The Plan calls for several interagency work groups to be established to research and, where necessary, to propose legislation to facilitate the development of such varied topics as:

- compatible data base to serve the employment and training system;
- streamline intake and assessment systems;
- identify retraining needs;
- involve business community to work collaboratively with education in the planning, operation, and evaluation of training programs;
- establish uniform skill standards for vocational and technical training; and
- promote the use of apprenticeship programs for both adults and youth.

In early 1994, the Council began the implementation process by identifying the tasks for four interagency work groups and the process to get them established. The areas of concentration for the work groups are: the streamlining of the intake and assessment process; development of strategies to provide earlier access to information and quality retraining for laid off workers; and collaborative involvement of the business community in the planning, operation and evaluation of training programs. This is the beginning of the coordinated approach for the preparation of Missouri's work force.

## **VI. ASSURANCES**

### **JTPA Compliance with Section 167**

The State has adequate methods of administration to assure compliance with Section 167 of the Act through ongoing monitoring, site visits, and technical assistance.

**DEOBLIGATION AND  
REOBLIGATION POLICY**

**TITLE II-A AND TITLE II-C**

Beginning July 1, 1994, each Service Delivery Area (SDA) Administrative Entity (AE) must obligate 85% of its Title II-A and 85% of its Title II-C formula allocated funds, including unexpended balances from prior program years, during the program year. Obligate means the amounts of orders placed, contracts awarded, goods and services received, and similar transactions during a funding period that will require payment by the AE or a subcontractor during the same or future period.

The Obligation Requirement shall be computed based on allocations net of any transfers made in accordance with JTPA Sections 206, 256, or 266.

An AE which does not obligate 85% of its funds as outlined above will have an amount equal to the amount of unobligated funds that exceeds 15% of its allocation deobligated from its next year's formula allocation. These funds will be reobligated to those AE's that met the 85% obligation requirement based on a formula to be developed by the Division of Job Development and Training which makes amounts available to SDAs which have the highest rates of unemployment for an extended period of time and those with the highest poverty rates.

**PY'94 JTPA**  
**TITLE II-A AND TITLE II-C**  
**FUND ALLOCATION METHODOLOGY**

Job Training Partnership Act (JTPA) funds were allocated to Service Delivery Areas (SDAs) in accordance with the formula specified in Sections 202 and 262, as amended. In accordance with Section 701(c), it is the Interim Training Service Formula which is in effect for Program Year 1994 fund allocations.

The funding allocations released were based on Missouri Title II-A and Title II-C allotments. The Title II-A allotment was \$15,563,967 and the Title II-C allotment was \$10,375,999.

Data sources are as follows:

- Population data was based on the 1990 Census.
- Unemployment and civilian labor force data was based on data provided by the Missouri Division of Employment Security (ES). The time period used for determining SDA annual averages was the same as that used by the U.S. Department of Labor (DOL) when it allots funds to the States. This was the annual average based on the 12 month period of July 1992 through June 1993.
- Economically disadvantaged data was provided by DOL. The data was developed under a special contract in cooperation with the U.S. Census. This data was developed for each state at a county and local jurisdictional level. For Title II-A fund allocations, the total number of economically disadvantaged aged 22 through 72 in each SDA was used. For Title II-C fund allocations, the total number of economically disadvantaged aged 16 through 21 in each SDA was used.

Funds were allocated through two major procedures. The first procedure was to use the original formula distribution as detailed in Section 202 for Title II-A and Section 262 for Title II-C. The second procedure was to apply the 90 percent hold-harmless provision in accordance with each Section in the 1992 Amendments to JTPA.

**STEP I**

The first step for allocating funds to the SDAs was:

- Seventy-seven percent (77%) of Title II-A funds were allocated. Eighty-two percent (82%) of Title II-C funds were allocated.

- These funds were each divided into thirds (77% of Title II-A funds were divided by three, and 82% of Title II-C funds were divided by three).
- The three parts to the allocation formula specified in Section 202 (Title II-A) and Section 262 (Title II-C) were then calculated utilizing the data previously listed. The procedure for this was:
  1. All county level labor force data was aggregated by the ES to create SDA level data. Unemployment rates were then calculated on each SDA using this data.
  2. Each SDA was analyzed to determine if it constituted an area of substantial unemployment (an area with an average rate of unemployment of at least 6.5%). This method parallels the method used by DOL in allocating funds to the states.

The Department of Labor first determined if a state was an Area of Substantial Unemployment. For those states which were not, DOL then determined ASUs at the substate level. The state of Missouri was not an ASU and, therefore, substate ASUs were designated.

For PY'94 SDAs 1, 3, 5, 8, 12, 13, and 14 did not qualify as an ASU. Sub-SDA ASUs were designated for these SDAs using procedures guided by the law and by DOL's method of allotting to the state.

The law defines an ASU in Section 4(3) as "...any area of sufficient size and scope to sustain programs under parts A and C of title II...and which has an average rate of unemployment of least 6.5% ...". Field Memorandum #133-84 from DOL provides further guidance. It indicates that when a state does not qualify in total as an ASU, all jurisdictions within the state should be examined with the view of designating as ASU's contiguous combinations of counties, cities, towns, townships, other minor civil divisions and/or census tracts (or enumeration districts). It also indicates that an ASU must have a population of at least 10,000. The following method was used based on this guidance:

- Census Tracts or Enumeration District level data on unemployment was calculated using the census-share methodology required by the Bureau of Labor Statistics. The census tract or enumeration district's share of SDA unemployment was applied to SDA unemployment data for the period of July 1992 to June 1993.

- Census Tracts or Enumeration Districts within the SDA were aggregated until a unit was obtained that was contiguous, had a population of greater than 10,000, and had an unemployment rate of at least 6.5%.

3. One-third of the Title II-A 77% funds were allocated to all ASUs. The number of unemployed persons in each ASU was divided by the total number of unemployed persons in all ASUs. This figure was then multiplied by the funds available. This same procedure was used with respect to one-third of the Title II-C 82% funds.
4. One-third of Title II-A 77% funds were allocated to SDAs based on excess unemployment. This was also done with respect to one-third of Title II-C 82% funds. Excess unemployment is defined as the number that represents the number of unemployed individuals in excess of 4.5% of the civilian labor force in the SDA or ASU. This is in accordance with Sections 202(d)(1)(B) and 262(d)(1)(B) of JTPA as amended in 1992. The number in the civilian labor in each SDA or ASU was multiplied by 4.5%. The resulting number in each SDA or ASU was then subtracted from the actual number of unemployed in each SDA or ASU. This then became the excess number of unemployed. The ASU number of excess unemployed was higher for those SDAs which had designated ASUs. Therefore, the ASU excess was used. The excess number in each SDA or ASU was divided by the total excess number in the state (the sum of the SDA and ASU numbers). This figure was then multiplied by the funds available.
5. One-third of Title II-A 77% funds were allocated to SDAs based on their relative share of economically disadvantaged adults ages 22 through 72. For Title II-C, one third of the 82% funds were allocated to SDAs based on their relative share of economically disadvantaged youth ages 16 through 21. The data provided by DOL for this factor was used in accordance with Sections 202(d)(1)(A) and 262(d)(1)(A).

## STEP II

The second step for allocating funds to the SDAs required application of the hold-harmless in the 1992 JTPA amendments in Section 202(b)(2)(A) for Title II-A 77% and Section 262(b)(2)(A) for Title II-C 82%. The hold-harmless provision specifies that each SDA must receive a minimum of 90% of the average of its allocation percentage for the two preceding program year allocations. This allocation percentage is described as the relative share. The procedure to determine the relative share was:

1. PY'92 and PY'93 allocations for each SDA were added together and divided by two to determine the average two year allocation.
2. The average for each SDA was divided by the state average to determine the SDAs relative share.
3. This relative share was multiplied by .90 to determine the SDAs 90% of their relative share.
4. This figure was multiplied by the total amount of Title II-A funds available to the SDAs to derive the minimum level of funds for each SDA.

After determining each SDAs minimum level of funds, the following procedure was used to complete the final allocation.

1. The minimum amount for each SDA was compared to the amount allocated by the formula process described in Step I.
2. SDAs whose allocation in Step I was less than the minimum amount were brought up to the minimum amount.
3. The remaining SDAs were re-allocated funds by starting from Step I and going through the entire process again. The SDAs who were brought up to the minimum level (and the money they received) were excluded from this process. This last step yielded the final allocation of Title II-A and Title II-C funds.

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#### PY'94 JTPA TITLE II-B FUND ALLOCATION METHODOLOGY

Job Training Partnership Act Title II-B funds were allocated to SDAs pursuant to Section 252(b) which requires the use of the Title II-C formula. The funding allotments released were based on a Missouri Title II-B allotment of \$13,586,096. One hundred percent (100%) of the Title II-B funds is allocated to the SDAs.

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#### PY'94 JTPA TITLE II-A 5% FUND ALLOCATION METHODOLOGY (Experienced Worker)

Title II-A 5% funds will be equitably allocated to all 15 SDAs based on a formula methodology. The formula methodology will take into account the relative share of the population of eligible older individuals age 55 and over residing in each SDA and the participation of such older individuals in the labor force.

## TITLE II-A 8% PROGRAM PLAN

In accordance with Section 123(c), Governor's Plan Requirements, the Missouri Department of Elementary and Secondary Education (DESE), working jointly with the Division of Job Development and Training (JDT), has prepared the following services plan to fulfill the requirements for the use of 8% education coordination funds.

### I. SCHOOL-TO-WORK TRANSITION PROGRAMS

The goals for school-to-work transition programs include but are not limited to:

- Provide youth with the necessary academic, career decision-making skills and knowledge for post high school employment and training;
- Increase the rate of graduation from high school and increase the rate at which dropouts return to school or an alternative education setting;
- Increase coordination with work site and/or exposure to work for youth via mentoring, volunteerism, exploration, work experience, or other means;
- Integrate the concepts of school-to-work transition into the school curriculum to include the development of programs and services which are available on a year-round basis;
- Develop partnerships with local private sector employers and use other community resources to meet the school-to-work transition needs of youth; and
- Develop youth apprenticeship type and/or Tech Prep pilot projects on a statewide basis.

#### A. Activities and Services

School-to-work transition programs funded under this section shall be focused on four (4) key areas:

1. Basic and occupational education;
2. Work readiness;
3. Work and work-related experience; and
4. Participant support and guidance services.

Programs designed under any or all of these four (4) areas may include activities and services identified in Section 264(b) of the Act that will assist in meeting the goals identified above.

**B. Work-Based Curriculum**

School-to-work projects funded under this section will use a work-based curriculum which addresses problem-solving, teamwork, and self-management. It is anticipated that projects will articulate individual SDA pre-employment work maturity systems with similar systems and curriculum in use by local education agencies and/or alternative service providers.

**C. Career Path Employment**

School-to-work projects will provide career path employment services such as career assessment, guidance and counseling, and other services which will assist the youth in identifying post-secondary education and employment opportunities. Such activities will be integral to the development of each participant's individual service strategy (ISS).

**D. Integration**

Where appropriate, projects will provide services to meet the school-to-work transition needs of youth in a way that prevents the duplication of services and delivery thereof by involving alternative service providers such as community-based and non-profit organizations in the planning of projects.

**E. Linkages**

School-to-work projects will establish linkages which reduce duplication and the need for JTPA resources by using other state and federal funding sources.

Particular emphasis will be made in coordinating 8% school-to-work projects with SDA funded Title II-C and Title II-B programs. Each program funded will be asked to establish linkages, where appropriate, with the programs cited in Section 123(c)(1)(E):

- i. Title II and Part B of Title IV;
- ii. the Elementary and Secondary Education Act (20 U.S.C. 2701 et seq.);
- iii. the Carl D. Perkins Vocational and Applied Technology Act (20 U.S.C. 2301 et seq.);
- iv. the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.);
- v. the Adult Education Act (20 U.S.C. 1201 et seq.);
- vi. the JOBS program;
- vii. The Stewart B. McKinney Homeless Assistance Act (Public Law 100-77; 101 Stat. 482); and
- viii. the National and Community Service Act of 1990 (42 U.S.C. 12501 et seq.).

## **II. LITERACY AND LIFELONG LEARNING**

The goals to be achieved by literacy and lifelong learning programs include but are not limited to:

- Create greater access to education, labor market and career planning information, and resources;
- Promote SCANS competencies and foundation skills within adult literacy to develop lifelong learners;
- Support broad-based initiatives that will assist or provide Missouri employers and citizens with information and services to determine their literacy, occupational and skill needs, and/or deficiencies to better realize their full economic potential;
- Establish an environment for change in how agencies and individuals invest and re-invest in human capital for longer-term results;
- Encourage coordination across programs and agencies that promote the concepts of parents-as-teachers and family learning so that the family becomes the foundation in developing the concepts of literacy and lifelong learning;
- Promote the articulation of training programs for the sequential development of an individual's skills, thereby promoting lifelong education; and
- Develop youth apprenticeship type and/or Tech Prep pilot projects on a statewide basis.

### **A. Activities and Services**

Literacy and lifelong learning programs funded under this section will use activities and services included in Sections 204 and 264 of the Act that will assist in meeting the goals identified above. Special emphasis will be placed on:

1. Literacy services, including GED preparation, tutoring, and living skills;
2. Literacy, skill, or other audit services for participants and employers;
3. Youth service and conservation corps education components; and
4. Support activities that allow adults to pursue further education and training.

B. Integration

Where appropriate, projects will provide services to meet the literacy and lifelong learning needs of youth and adults that prevent the duplication of services and delivery thereof by involving alternative service providers such as community-based organizations in the planning of projects.

C. Settings

Literacy and lifelong learning projects are anticipated in a variety of settings to include: schools, community buildings and agencies, shelters, and local employers.

D. Linkages

Literacy and lifelong learning programs funded under this section will be encouraged to establish linkages and coordination which reduce duplication. Collaboration is anticipated with existing programs, such as parents-as-teachers, FUTURES, School Age Child Care, Adult Education, Even Start, Apprenticeship, etc. Each program funded will be asked to establish linkages, where appropriate, with the programs cited in Section 123(C)(2)(D) of the Act.

- i. Title II and Title III;
- ii. the Adult Education Act;
- iii. the Carl D. Perkins Vocational and Applied Technology Act;
- iv. the Stewart B. McKinney Homeless Assistance Act;
- v. the JOBS program;
- vi. the Rehabilitation Act of 1973 (29 U.S.C. 701 et seq.);
- vii. the National Literacy Act of 1991 (Public Law 102-73);
- viii. the Emergency Immigration Education Act of 1984 (20 U.S.C. 3121 et seq.); and
- ix. the National and Community Service Act of 1990.

III. NON-TRADITIONAL TRAINING FOR WOMEN

The goals to be achieved and services to be provided by non-traditional employment for women programs include but are not limited to:

- Promote educational, training, and/or career enhancement opportunities for women;
- Identify and address obstacles women face in non-traditional occupations and incorporate potential solutions to those barriers in program design;

- Inform women of potential increases in earnings, benefits, job satisfaction, and job advancement when employed in a non-traditional field;
- Dispel myths and address prejudice about non-traditional fields for women by providing exploration and information to them; and
- Provide support to women in non-traditional careers which increase their self-esteem, awareness, and retention in programs via family support and long-term case management.

#### A. Activities

Non-traditional training programs for women funded under this section may include activities and services identified in Section 204 and 264.

These goals will be accomplished through a variety of services and activities that may include:

1. Career exploration; job shadowing, mentoring, guidance and counseling, and work experience;
2. Supportive services; and
3. Skill training and/or placement into on-the-job training in non-traditional fields.

Through the use of these activities, we hope to expose women to their full potential as well as provide the encouragement and support many women need to succeed in non-traditional fields.

#### B. Integration

Where appropriate, projects will provide services to meet the non-traditional training needs of women that prevent the duplication of services and delivery thereof by involving alternative service providers such as community-based and non-profit organizations in the planning of projects.

#### C. Linkages

Non-traditional employment for women programs will be encouraged to establish linkages which reduce the duplication and the need for JTPA resources by using other state and federal funding resources to include Carl D. Perkins Vocational and Applied Technology Act funds and services.

#### IV. PROPORTION OF FUNDS THAT WILL BE USED TO ACHIEVE THE GOALS

Not less than 80% of the funds allocated under Section 123(a) shall be expended to pay for the federal share of projects conducted in accordance with subparagraphs (A), (B), and (C) of subsection (a)(2).

#### V. SERVICE TO 14 AND 15 YEAR OLDS

In accordance with Section 628.315(f) of the Interim Final Regulations, services provided under Section 123 will be available to 14 and 15 year olds.

#### VI. BARRIERS TO EMPLOYMENT

In accordance with Section 123(d)(2)(C), not less than 75% of the funds allocated for school-to-work, literacy and lifelong learning, and non-traditional training for women will be expended for activities for economically disadvantaged individuals who experience barriers to employment. Programs funded under Section 123 will use the barriers identified in Sections 203(b) and 263(b) and (d). Additional barriers identified by SDAs under Sections 203(d) and 263(h) will be incorporated into agreements required by Section 123(b) where JTPA 8% funds are used.

#### VII. STATE EDUCATION AGENCY/SERVICE DELIVERY AREA AGREEMENTS

The Department of Elementary and Secondary Education, operating as the state education agency under this plan, will enter into agreements with each SDA and other entities such as other state agencies and community-based organizations, as appropriate. Agreements, where 80% funds are used within the SDA, will be specific to the projects funded.

#### VIII. COORDINATION OF SERVICES

The Department of Elementary and Secondary Education uses 20% of the funds allocated under Section 123 for the purpose of coordinating school-to-work, literacy and lifelong learning, and nontraditional employment for women programs funded with 80% funds. Specifically, DESE coordinates with JDT and the Missouri Women's Council, among other agencies, to enhance training and educational services. In addition, DESE will provide other valuable services which enhance coordination between education and JTPA Titles II and III.

## SUBSTATE MONITORING PLANS

As required by the Job Training Reform Amendments (JTRA) of 1992, Service Delivery Areas (SDAs) and Substate Grantees (SSGs) must develop written Substate Monitoring Plans (SMPs) to effectively implement the oversight requirements described in Section 627.475 of the Job Training Partnership Act (JTPA), as amended. SDAs and SSGs are required to review the previously released U.S. Department of Labor (DOL) monitoring Technical Assistance Guide (TAG) in the development of SMPs. Although the TAG was written prior to the enactment of the JTRA, it contains many elements which describe an effective local monitoring system and quality controls.

The following are considered to be the minimum elements and standards to be complied with in the development and implementation of a Substate Monitoring Plan. All plans must be submitted with the SDA's Job Training Plan. The Substate Monitoring Plan must be in a manual format.

1. Identification of Who is to Perform the Oversight Function: The plan must address the organization [or position(s)] if performed by the Administrative Entity (AE) which will perform any monitoring activities. The SMP must demonstrate that the organization [or person(s)] has the ability and capacity to fully implement all required functions. Oversight systems must demonstrate use of monitors who have a separation of duties from the items being reviewed.
2. Identification of the Private Industry Council's (PICs) and Local Elected Official's (LEOs) Roles in Reviewing Oversight and Program Evaluation Information: The PIC has a statutory responsibility to ensure that JTPA-funded programs are properly administered. Periodic reports must be submitted to the PIC in order for them to make appropriate judgements.

The Division requires periodic monitoring reports to the PIC regarding service provider compliance with the terms and conditions of contractual scopes of work (including JTPA statutory and regulatory requirements). These same reporting requirements extend to all Administrative Entities which operate programs directly.

Also, subcontractor and SDA-wide performance reviews must be provided to the PIC periodically. In addition, programs must be periodically reported on regarding their overall quality focusing on the adequacy of: assessment, JTPA program activities and services, coordination with other agencies to meet the comprehensive needs of clients, and participant outcomes.

Inherent with the PIC's statutory requirement, is an assurance that when problems are identified, prompt and appropriate corrective action will be taken.

The Private Industry Council must ensure the above listed reporting systems function properly by way of reports to the full council or a standing committee.

Local Elected Officials may participate in this reporting/review process in accordance with agreements developed with the Private Industry Council.

3. The SMP must be written and fully describe all aspects of the SDA's/SSG's monitoring system.
4. The SMP must be signed by the Director of the Administrative Entity, the PIC Chair and the Chief Local Elected Official.
5. The plan must demonstrate that the SDA/SSG's programmatic and operational oversight systems effectively regulate JTPA, as amended, as well as, JDT issuances.
6. SDAs must ensure that every brokered contractor performs on-site monitoring of OJT employers and other subcontractors to verify compliance with subcontract terms before making payments. Once initial compliance is established, a periodic payment structure may be established. SDA monitorings of brokered subcontractors must be conducted periodically to ensure on-going integrity. The monitoring of OJT employer records and training systems must be in full compliance with JDT standards at all times.
7. Non-brokered programs and services performed by the AE must be monitored at least annually, except where JDT's OJT monitoring requirements are stricter.
8. The SMP must describe (or include) the monitoring tools and instruments which will be utilized, how they will be utilized, and the frequency of their use.
9. The SMP must address the various procedures which will be utilized to ensure compliance with other (non-JTPA) federal laws and regulations (i.e., Fair Labor Standards Act).
10. The SMP must address the various oversight procedures which will be utilized to ensure that participants are provided quality services. The Division considers program quality as essential in achieving the goals of the Job Training Reform Amendments and substantive participant outcomes.
11. SDAs and SSGs must use random sampling techniques in participant file reviews to test eligibility in every subcontractor and program which is operated. The following sample sizes are required at a minimum depending on the universe to be reviewed at an operator by program subpart (Title II-A, II-B, II-C) and Title:

<u>Universe</u>	<u>Sample Size</u>
1-200	51
201-300	55
301-400	58
401-500	60
501-1,000	63
1,001-1,500	65
1,501-2,000	65
2,001-5,000	67
5,001-10,000	67

This table is based on random sampling for attributes when the expected rate of occurrence is not over 20 percent with a confidence level of 90 percent, plus or minus 8 percent.

- 13. Each SDA must perform a JTIS validation of participant records at least annually. The validation must ensure that applicant and participant records have been entered in the JTIS and, conversely, that participants listed in JTIS have a complete file. A statistical sampling, using the above universes and sample sizes, must also be performed which reviews the accuracy of program activity and participant termination codes entered into JTIS. This sample must also include a full review of the accuracy of MOJT form completion and keypunching of information from MOJT forms into JTIS. At a minimum, the JTIS validation must be conducted at a time which will ensure a majority of participant files are reviewed during the course of a program year.
- 14. A description of the processes to be used for interviewing which includes participants, employers, trainers, operational and administrative staff. Documented interviewing for compliance and program quality must be performed on all brokered contracts. AEs which perform various functions internally may substitute documented reviews of the processes performed by staff when process reviews would be clearly more suitable and yield information of higher quality.
- 15. A description of the SDAs oversight system to ensure compliance with all equal opportunity provisions of the JTPA. The oversight system must encompass both the Administrative Entity and all subcontractors and include applicant outreach, applicant selection criteria, program enrollment criteria, participant outcomes, and agency hiring practices.

## INCENTIVE AWARD POLICY

Missouri's incentive grant system will:

- Provide incentive grants to SDAs that exceed their minimum performance goals only if 65% of their participants meet the definition of hard-to-serve pursuant to Sections 203(b), 263(b) and (d);
- Set aside incentive funds for SDAs that demonstrate quality service to out-of-school youth;
- Consider the relative size of the SDA; and
- Provide incentive awards to SDAs for placing participants in employment that includes employer-assisted benefits.

The method to distribute incentive grants for PY'94 consists of the following steps:

Step 1: A SDA will qualify for an incentive award only if the proportion of its total PARTICIPANTS beyond objective assessment in Title II-A and Title II-C at the end of the program year is equal to or greater than 65% hard-to-serve as defined in Sections 203(b), 263 (b) and (d) of the JTPA. This constitutes a stand-alone eligibility criterion for an incentive award.

Step 2: Eighty percent (80%) of the Title II-A and Title II-C incentive pool of funds will be ALLOCATED to the six (6) national standards.

Step 3: Ten percent (10%) of the Title II-A and Title II-C incentive pool of funds will be allocated for model out-of-school programs with demonstrated records of success.

Step 4: Ten percent (10%) of the Title II-A and Title II-C incentive pool of funds will be allocated to the employer-assisted benefits service level.

Step 5: Calculate the maximum award available to an SDA on the national standards by multiplying 80% of the pool of funds by the percentage portion of Title II-A (77%) and Title II-C (82%) funds for all SDAs.

Step 6: Divide the maximum award available to each SDA on the national standards by six (6) and assign one-sixth to each of the national standards in order to create separate reward pools for each standard.

Step 7: A SDA WILL QUALIFY FOR A model out-of-school program award ONLY IF THE PROPORTION OF ITS TOTAL YOUTH PARTICIPANTS IN TITLE II-C AT THE END OF THE PROGRAM YEAR IS EQUAL TO OR GREATER THAN 50% OUT-OF-SCHOOL AS DEFINED IN SECTION 263(F) OF THE AMENDED JTPA, AND PURSUANT TO PARTS 628.803(A), (C)(2)(II), AND (H), OF THE FINAL RULE. THIS CONSTITUTES A STAND-ALONE CRITERION FOR 10% OF THE MAXIMUM AWARD AVAILABLE TO A SDA.

Step 8: Calculate the 10% maximum award available to an SDA on THE MODEL OUT-OF-SCHOOL PROGRAM AWARD CRITERIA.

Step 9: Performance MEETING THE MODEL OUT-OF-SCHOOL PROGRAM AWARD CRITERIA IS excluded from the tiered system.

Step 10: Awards FOR MEETING THE MODEL OUT-OF-SCHOOL PROGRAM CRITERIA will be determined in the following manner:

- For performance THAT MEETS THE CRITERIA, SDAs will receive 100% of the maximum award available FOR THIS FACTOR.
- For performance THAT FAILS TO MEET THE CRITERIA, SDAs will receive no award FOR THIS FACTOR.

NOTE: SEE THE OUT-OF-SCHOOL PROGRAM AWARD CRITERIA.

Step 11: Calculate the 10% maximum award available to a SDA on the employer-assisted benefits service level.

Step 12: Performance exceeding the employer-assisted benefits service level are excluded from the tiered system.

Step 13: Awards from the employer-assisted benefits service level will be determined in the following manner:

- For performance on the service level which is equal to or greater than the level, SDAs will receive 100% of the maximum award available FOR THIS FACTOR.
- For performance on the service level which is less than the level, SDAs will receive no award FOR THIS FACTOR.

NOTE: SEE THE CRITERIS FOR EMPLOYER-ASSISTED BENEFIT SERVICE LEVEL.

Step 14: Performance exceeding each of the six (6) national standards will be measured against tiers which correspond to performance ranges. The following performance ranges will be the tiered system:

- the 25th percentile will always be the standard.
- the 50th percentile will be the point above the standard where 50% of the SDAs exceed the standard based on national statistical samples.
- the 65th percentile will be the point above the standard where 35% of the SDAs exceed the standard based on national statistical samples.
- the 75th percentile will be the point above the standard where 25% of the SDAs exceed the standard based on national statistical samples.

Step 15: Awards from each of the six (6) separate reward pools will be determined in the following manner:

- For performance on a standard which is less than the standard, SDAs will receive no award.
- For performance on a standard which is equal to or greater than the 25th percentile and less than the 50th percentile, SDAs will receive 80% of the reward pool for that standard.
- For performance on a standard which is equal to or greater than the 50th percentile and less than the 65th percentile, SDAs will receive 90% of the reward pool for that standard.
- For performance on a standard which is equal to or greater than the 65th percentile and less than the 75th percentile, SDAs will receive 95% of the reward pool for that standard.
- For performance on a standard which is equal to or greater than the 75th percentile, SDAs will receive 100% of the reward pool for that standard.

Step 16: SDAs failing to achieve a performance equal to or greater than the 25th percentile on a minimum of four (4) of the six (6) national standards, including at least one youth standard, will be disqualified from an incentive grant.

Step 17: The balance of funds remaining after the distribution of funds based on performance on the national standards, the employer-assisted benefits service level, and THE OUT-OF-SCHOOL CRITERIA, will be distributed in the second round. The balance remaining from the employer-assisted benefits service level, AND OUT-OF-SCHOOL CRITERIA is divided by six (6). One-sixth is added to every national standard. This is done for each SDA. The combined national, employer-assisted benefit AND OUT-OF-SCHOOL CRITERIA balance

remaining is the total amount available for distribution in the second round.

Step 18: SDAs are excluded from awards on individual standards in the second round when they fail to meet or exceed them.

Step 19: Each qualifying SDA's performance on each national standard is adjusted for size by multiplying the percent exceeded by the share of Title II-A (77%) and Title II-C (82%) funds received by the SDA in the second round. This yields a net performance.

Step 20: The net performance of qualifying SDAs is summed to a total for each standard. Each SDA's net performance on a standard is then divided by the total for the standard to determine the SDA's relative share of net performance.

STEP 21: The total amount available for each standard is multiplied by the SDA's relative share of net performance to determine the SDA's second round award on individual standards.

STEP 22: Each SDA's award on each individual standard is summed across the standards to yield the SDA's total second round award.

STEP 23: Each SDA's first round award is summed with its second round award to obtain the SDA's final distribution.

## CRITERIA FOR MODEL OUT-OF-SCHOOL YOUTH PROGRAMS

TEN PERCENT OF THE INCENTIVE POOL FUNDS FOR TITLES II-A AND II-C WILL BE ALLOCATED FOR PROGRAMS WITH A DEMONSTRATED RECORD OF SUCCESS IN SERVING OUT-OF-SCHOOL YOUTH. MISSOURI'S CRITERIA IS DESIGNED TO EXPLICITLY PROMOTE INCREASED, QUALITY SERVICE TO THIS PARTICULARLY HARD-TO-SERVE POPULATION. JTPA REVISIONS REQUIRE THAT FOR AN SDA TO RECEIVE CONSIDERATION FOR SUCH AN AWARD, THEY MUST FIRST PASS A "GATE" IN WHICH NOT LESS THAN 50% OF YOUTH SERVED MUST BE OUT-OF-SCHOOL. THEN, IT MUST BE DETERMINED WHETHER OR NOT SPECIFIC PROGRAMS HAVE A "DEMONSTRATED RECORD OF SUCCESS".

THE FOLLOWING CRITERIA WILL BE USED TO DETERMINE IF A PROGRAM DEMONSTRATES QUALITY TO OUT-OF-SCHOOL YOUTH:

- THE CRITERIA WILL CONSIDER INNOVATIVE YOUTH MODELS HAVING A POSITIVE IMPACT ON LONG-TERM EARNINGS POTENTIAL. MISSOURI ENCOURAGES SDAS TO PILOT OR REPLICATE APPROACHES THAT ENCOMPASS IDEAS AND STRATEGIES SUCH AS CONTEXTUAL LEARNING AND SCANS COMPETENCIES WHICH INTEGRATE OCCUPATIONAL AND BASIC SKILLS WHILE EMPHASIZING THOSE SKILLS THAT ARE IN DEMAND OR ARE PROJECTED TO BE IN DEMAND IN THE WORKPLACE. SPECIFICALLY, THE OUT-OF-SCHOOL PROGRAMS THAT INCLUDE ANY CRITERIA SUCH AS THE FOLLOWING WILL BE AWARDED.

### PROGRAM CRITERIA

HANDS-ON LABOR INTENSIVE ACTIVITIES SUCH AS: HOUSING RENOVATION, CONSTRUCTION AND/OR WEATHERIZATION; DISASTER RELIEF; CONSERVATION/NATURAL RESOURCE MANAGEMENT; AND/OR, HUMAN SERVICE ACTIVITIES ARE COMBINED WITH EDUCATIONAL ACTIVITIES SUCH AS: GED CLASSES; LIFE/JOB SKILLS; AND, LEADERSHIP TRAINING.

THE PROMOTION OF ACTIVITIES THAT LEAD TO THE ACQUIRING OF SKILLS SUCH AS ALLOCATING RESOURCES, ACQUIRING AND EVALUATING INFORMATION, MONITORING AND CORRECTING THE PERFORMANCE OF SYSTEMS, AND APPLYING TECHNOLOGY TO SPECIFIC TASKS, AS WELL AS OTHER BASIC, THINKING AND INTERPERSONAL SKILLS.

VOCATIONAL-ORIENTED, BASIC SKILLS ARE WEAVED INTO JOB TRAINING.

PERSONAL WORK TRAITS AND EMPLOYABILITY SKILLS ARE ENHANCED THROUGH PRE-EMPLOYMENT/WORK MATURITY TRAINING.

INSTRUCTION CONTAINS WORK-BASED LEARNING OBJECTIVES.

JOB SPECIFIC SKILLS SUCH AS COMPUTER ASSEMBLY, ARCHITECTURE, AIR CONDITIONING AND HEATING, RETAIL SALES, AND FOOD SERVICE, ARE TAUGHT.

THIS BROAD APPROACH ALLOWS ANY SDA THAT MEETS THE INITIAL 50% GATE TO RECEIVE AN AWARD, AND POINTS THE SDAS IN THE DIRECTION OF MODELING THEIR OUT-OF-SCHOOL PROGRAMS AFTER YOUTH MODELS THAT HAVE SHOWN MORE SUCCESS IN IMPROVING THE LONG-TERM EARNINGS POTENTIAL OF THIS HARD-TO-SERVE POPULATION. SDAS ARE ENCOURAGED TO FOCUS ON PROGRAM CONTENT, AS WELL AS INCREASED SERVICE TO OUT-OF-SCHOOL YOUTH. PROGRAMS THAT ENCOMPASS IDEAS AND STRATEGIES SUCH AS CONTEXTUAL LEARNING AND THE SCANS SKILLS ARE STRONGLY ENCOURAGED.

CRITERIA FOR PLACEMENTS IN EMPLOYMENT  
PROVIDING EMPLOYER ASSISTED BENEFITS

THE REGULATIONS FOR PY'94-95 PERFORMANCE STANDARDS REQUIRE THAT STATES DEVELOP A TITLE II-A AND II-C 5% INCENTIVE POLICY TO AWARD PLACEMENT OF PARTICIPANTS IN EMPLOYMENT PROVIDING EMPLOYER-ASSISTED BENEFITS. MISSOURI WILL AWARD 10% OF THE INCENTIVE POOL OF FUNDS BASED ON THIS CRITERIA.

THE DEFINITION FOR AN EMPLOYER-ASSISTED BENEFIT IS DETAILED IN THE SPIR, I.E., IT MUST CONSIST OF, AT A MINIMUM, HEALTH INSURANCE BENEFITS AND COVERAGE UNDER SOCIAL SECURITY OR AN EQUIVALENT PENSION PLAN. IN THE JTIS SYSTEM THIS INFORMATION CAN BE CAPTURED ON THE MOJT-3 IN FIELD 20, "FRINGE BENEFITS". BY DEFINITION, THESE WOULD HAVE TO BE TERMINATIONS FROM TRAINING.

THE DEPARTMENT OF LABOR (DOL) GUIDELINES PROVIDE THAT THE STATE COULD DETERMINE A DEPARTURE POINT OR BENCHMARK TO USE IN SETTING A REWARD LEVEL FOR BENEFITS. THE DEPARTURE POINT WOULD SERVE THE SAME FUNCTION SERVED BY THE NUMERICAL NATIONAL PERFORMANCE STANDARDS.

BUREAU OF LABOR STATISTICS (BLS) DATA: THE BLS CONDUCTED A NATIONAL SURVEY OF EMPLOYEE BENEFITS IN LARGE, MEDIUM, AND SMALL EMPLOYERS IN 1991-92. THE RESULTS FOR LARGE AND MEDIUM EMPLOYERS WERE PUBLISHED IN A REPORT AND ARE REPRESENTATIVE DATA FOR 36 MILLION EMPLOYEES. THE RESULTS FOR SMALL EMPLOYERS WERE PUBLISHED IN A SEPARATE REPORT AND ARE REPRESENTATIVE OF 40.8 MILLION EMPLOYEES.

THE SURVEY CONDUCTED OF MEDIUM AND LARGE EMPLOYERS DEFINED THEM AS ESTABLISHMENTS EMPLOYING 100 OR MORE EMPLOYEES. SMALL EMPLOYERS WERE DEFINED AS ESTABLISHMENTS EMPLOYING LESS THAN 100.

THESE REPORTS CONTAIN DATA ON THE INCIDENCE OF EMPLOYEES PARTICIPATING IN SOME TYPE OF EMPLOYEE BENEFIT PLAN. THE DATA COVERS A RANGE OF DIFFERENT TYPES OF BENEFIT PLANS: HEALTH INSURANCE, PENSIONS, PAID HOLIDAYS, ETC. IT ALSO AGGREGATES THAT DATA FOR DIFFERENT EMPLOYEE GROUPS. SUCH DATA COULD BE DERIVED AND ADAPTED AS A BASIS FOR A BENCHMARK FOR EMPLOYER-ASSISTED BENEFITS. THE MAIN WEAKNESS WITH THIS DATA IS THAT IT IS BASED ON A NATIONAL SURVEY SAMPLING WHICH MAY OR MAY NOT BE REPRESENTATIVE OF LOCAL ECONOMIC CONDITIONS.

THIS APPROACH TO AWARDING FUNDS FOR EMPLOYER-ASSISTED BENEFITS IN PY'94 SHOULD BE REGARDED AS INTERIM. BETTER NATIONAL DATA WILL BE MADE AVAILABLE IN THE FUTURE.

THE RATIONALE IS AS FOLLOWS: THE MINIMALLY ACCEPTABLE LEVEL OF PLACEMENTS IN JOBS PROVIDING EMPLOYER-ASSISTED BENEFITS SHOULD BE ESTABLISHED AT THE PROPORTION OF INCIDENCE IN THE POPULATION OF EMPLOYEES RECEIVING BENEFITS. IN OTHER WORDS, SDAS SHOULD BE MINIMALLY AS GOOD AT PLACING PARTICIPANTS IN JOBS WITH EMPLOYER-ASSISTED BENEFITS AS THE PARTICIPANTS WOULD BE IF THEY OBTAINED A JOB ON THEIR OWN IN CURRENT ECONOMIC CONDITIONS.

SINCE THIS MEANS THAT THE STATE IS ESTABLISHING A BENCHMARK FOR PLACEMENTS, CERTAIN ASSUMPTIONS ARE BUILT INTO THE SELECTION OF A TARGET FIGURE:

- IT IS ASSUMED THAT THE LARGEST NUMBER OF PLACEMENTS IN THE MISSOURI JTPA SYSTEM OCCUR WITH SMALL EMPLOYERS. THIS IS ASSUMED BECAUSE THE DATA SUGGEST THAT THE LARGEST NUMBER OF EMPLOYERS AS WELL AS THE LARGEST NUMBER OF NEW JOBS IN MISSOURI OCCUR WITH EMPLOYERS WHO EMPLOY FEWER THAN 100 EMPLOYEES. FOR THIS REASON THE INCIDENCE OF EMPLOYEE BENEFITS PROVIDED BY SMALL EMPLOYERS SHOULD BE SELECTED.
- IT IS ASSUMED THAT THE LARGEST NUMBER OF PLACEMENTS IN THE JTPA SYSTEM WILL OCCUR IN SERVICE AND PRODUCTION JOBS. SECTORS HIRING THESE OCCUPATIONS HAVE SHOWN THE GREATEST GROWTH IN NEW JOBS. FOR THIS REASON THE INCIDENCE OF EMPLOYEE BENEFITS IN THESE OCCUPATIONAL GROUPINGS ARE LIKELY TO PROVIDE A BETTER INDICATOR OF EXPECTED MINIMUM PERFORMANCE.
- SINCE BENEFIT PLANS VARY WIDELY EVEN AMONG SMALL EMPLOYERS EMPLOYING SERVICE AND PRODUCTION JOBS, SOME BASELINE INDICATOR OF THE INCIDENCE OF A RANGE OF BENEFITS IS NEEDED. AS INDICATED, PERFORMANCE STANDARDS REGULATIONS REQUIRE THAT INCENTIVE AWARDS BE MADE FOR EMPLOYER-ASSISTED BENEFITS CONSISTING, OF AT A MINIMUM, HEALTH INSURANCE BENEFITS AND COVERAGE UNDER SOCIAL SECURITY OR EQUIVALENT PENSION PLAN. EMPLOYERS MAY PROVIDE ANY OF THE ABOVE OR NONE. THE INCIDENCE OF ONE CATEGORY OF BENEFITS DOES NOT NECESSARILY MEAN THE OTHERS ARE PROVIDED BY EMPLOYERS.
- IT IS ASSUMED, FOR PURPOSES OF ESTABLISHING A BENCHMARK, THAT THE INCIDENCE OF A "MEDICAL CARE" AS DEFINED IN THE BUREAU OF LABOR STATISTICS SURVEY, IS A PREDICTOR OF A RANGE OF BENEFITS PROVIDED BY AN EMPLOYER AND THAT IT IS A BETTER PREDICTOR OF PENSION BENEFITS OR OTHER FRINGE BENEFITS THAN OTHER BENEFIT PLAN INCIDENCES. IN OTHER WORDS, A MEDICAL CARE BENEFIT IS MORE LIKELY TO PREDICT THE EXISTENCE OF A PENSION/SOCIAL SECURITY BENEFIT THAN THE OTHER WAY AROUND.

FOR THESE REASONS, THE RECOMMENDED MINIMUM BENCHMARK IS THE BLS PERCENTAGE FOR THE INCIDENCE OF "MEDICAL CARE" FOR FULL-TIME PARTICIPATING PRODUCTION AND SERVICE EMPLOYEES IN SMALL PRIVATE ESTABLISHMENTS. THIS PERCENTAGE REPORTED IN THE 1992 BLS REPORT IS 61%.

THIS WOULD MEAN THAT 61% WOULD BE THE MINIMUM PERCENTAGE OF PLACEMENTS IN JOBS WITH EMPLOYER-ASSISTED BENEFITS IN ORDER FOR AN SDA TO OBTAIN A REWARD ON THIS FACTOR. IN MISSOURI, ATTAINMENT OF THIS MINIMUM WOULD DETERMINE WHETHER AN SDA OBTAINED 10% OF ITS MAXIMUM AWARD AVAILABLE.

#### TOLERANCE RANGE

SINCE THIS DATA IS IMPRECISE, AN ACCEPTABLE RANGE OF PERFORMANCE IS APPROPRIATE AS AN INTERIM MEASURE IN PY'94 TO ADJUST FOR LOCAL ECONOMIC CONDITIONS. THEREFORE, THE PROPORTION OF PLACEMENTS FALLING WITHIN A TOLERANCE RANGE OF 5% WILL BE ACCEPTABLE. THIS WILL MEAN THAT AN SDA ATTAINING A MINIMUM PLACEMENT LEVEL FALLING WITHIN 5 PERCENTAGE POINTS OF 61% WILL BE ELIGIBLE FOR AN AWARD UNDER THIS CRITERIA. THE TOLERANCE RANGE IS NOT RECOMMENDED AS A LONG TERM ADJUSTMENT TO THIS BENCHMARK.

## CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

This certification is being made in compliance with the Drug-Free Workplace Act of 1988.

A. The State of Missouri certifies that it will or will continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about --
  - (1) the dangers of drug abuse in the workplace;
  - (2) the grantee's policy of maintaining a drug-free workplace;
  - (3) any available drug counseling, rehabilitation, and employee assistance programs; and
  - (4) the penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --
  - (1) abide by the terms of the statement; and
  - (2) notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing within ten calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted --

- (1) taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
- (2) requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

B. Place of Performance: This statewide certification will apply to any of the state's executive branch departments and all of the divisions and locations within these departments throughout the State of Missouri. The addresses of the offices of each department director are attached. Specific site location will be provided, as needed, with grant applications.

This certificate is for the period from October 1, 1993 through September 30, 1994.

This assurance is given in connection with any and all financial assistance from the Department of Labor after the date this form is signed. This includes payments after such date for financial assistance approved before such date. The applicant recognizes and agrees that any such assistance will be extended in reliance on the representations and agreements made in this assurance, and the United States shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the applicant, its successors, transferees, and assignees, and on the authorized official, and is made in accordance with and to the extent of the authority of the undersigned.

State of Missouri:

9/24/93

Date

Pat Corzak

GOVERNOR

STATE OF MISSOURI

GOVERNOR'S COORDINATION AND  
SPECIAL SERVICES PLAN

PROGRAM YEARS 1994 AND 1995

Signature Page



April 28, 1994

Mel Carnahan, Governor

Date